

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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STEVEN GOODMAN, Individually and on	:
Behalf of All Other Persons Similarly Situated,	:
	: CIVIL ACTION: 11-CV-4395 (JHR)(JS)
Plaintiffs,	:
	:
-against-	:
	:
BURLINGTON COAT FACTORY	:
WAREHOUSE CORPORATION,	:
BURLINGTON COAT FACTORY	:
INVESTMENT HOLDINGS, INC.,	:
and BURLINGTON COAT FACTORY	:
HOLDINGS, INC.,	:
	:
Defendants.	:
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**DECLARATION OF SETH R. LESSER**

I, SETH R. LESSER, declare under the penalty of perjury and state as follows:

1. I am a member of the bar of this Court and a partner at Klafter Olsen & Lesser LLP, attorneys for Plaintiff Steven Goodman and the opt-in Plaintiffs in the above-captioned case. I submit this Declaration in Support of Plaintiffs' Motion for Final Certification of Fair Labor Standards Act Collective Action.

2. Attached to this Declaration as Exhibit A hereto is a true and accurate copy of portions of the transcript of Fred Hand's deposition taken in this matter on April 23, 2014.

3. Attached to this Declaration as Exhibit B hereto is a true and accurate copy of portions of the transcript of Louis Ansara's deposition taken in this matter on March 1, 2012.

4. Attached to this Declaration as Exhibit C hereto is a true and accurate copy of portions of the transcript of Lisa Chambrelli-Hine's deposition taken in this matter on November 26, 2013.

5. Attached to this Declaration as Exhibit D hereto is a true and accurate copy of portions of the transcript of Rebecca Hubbard's deposition taken in this matter on May 28, 2014.

6. Attached to this Declaration as Exhibit E hereto is a true and accurate copy of portions of the transcript of David Armstrong's deposition taken in this matter on January 14, 2014.

7. Attached to this Declaration as Exhibit F hereto is a true and accurate copy of portions of the transcript of Susan Hilton's deposition taken in this matter on February 20, 2014.

8. Attached to this Declaration as Exhibit G hereto is a true and accurate copy of portions of the transcript of Fidelina Escoto-Reyes' deposition taken in this matter on May 20, 2014.

9. Attached to this Declaration as Exhibit H hereto is a true and accurate copy of portions of the transcript of Majorie Anneau's deposition taken in this matter on May 16, 2014.

10. Attached to this Declaration as Exhibit I hereto is a true and accurate copy of portions of the transcript of Suzanne Ball's deposition taken in this matter on February 6, 2014.

11. Attached to this Declaration as Exhibit J hereto is a true and accurate copy of portions of the transcript of Daniel Casey's deposition taken in this matter on January 30, 2014.

12. Attached to this Declaration as Exhibit K hereto is a true and accurate copy of portions of the transcript of Eleanor Chimezie's deposition taken in this matter on January 31, 2014.

13. Attached to this Declaration as Exhibit L hereto is a true and accurate copy of portions of the transcript of John Currie's deposition taken in this matter on February 11, 2014.

14. Attached to this Declaration as Exhibit M hereto is a true and accurate copy of portions of the transcript of Teresa Dant's deposition taken in this matter on February 28, 2014.

15. Attached to this Declaration as Exhibit N hereto is a true and accurate copy of portions of the transcript of Rhonda Marie Ebbs' deposition taken in this matter on May 20, 2014.

16. Attached to this Declaration as Exhibit O hereto is a true and accurate copy of portions of the transcript of Susan Fortenberry's deposition taken in this matter on May 15, 2014.

17. Attached to this Declaration as Exhibit P hereto is a true and accurate copy of portions of the transcript of Steven Goodman's deposition taken in this matter on February 8, 2012.

18. Attached to this Declaration as Exhibit Q hereto is a true and accurate copy of portions of the transcript of Amy A. Harris' deposition taken in this matter on May 2, 2014.

19. Attached to this Declaration as Exhibit R hereto is a true and accurate copy of portions of the transcript of Mary Harrison's deposition taken in this matter on April 17, 2014.

20. Attached to this Declaration as Exhibit S hereto is a true and accurate copy of portions of the transcript of Aaron M. Haynes' deposition taken in this matter on February 5, 2014.

21. Attached to this Declaration as Exhibit T hereto is a true and accurate copy of portions of the transcript of Leah M. Johnson's deposition taken in this matter on January 24, 2014.

22. Attached to this Declaration as Exhibit U hereto is a true and accurate copy of portions of the transcript of Barbara Kawa's deposition taken in this matter on February 3, 2014.

23. Attached to this Declaration as Exhibit V hereto is a true and accurate copy of portions of the transcript of Michelle Knight's deposition taken in this matter on May 23, 2014.

24. Attached to this Declaration as Exhibit W hereto is a true and accurate copy of portions of the transcript of Yana Koleva's deposition taken in this matter on May 22, 2014.

25. Attached to this Declaration as Exhibit X hereto is a true and accurate copy of portions of the transcript of Michelle LaMaster deposition taken in this matter on May 19, 2014.

26. Attached to this Declaration as Exhibit Y hereto is a true and accurate copy of portions of the transcript of Sharon Layne's deposition taken in this matter on January 16, 2014.

27. Attached to this Declaration as Exhibit Z hereto is a true and accurate copy of portions of the transcript of Giang Le's deposition taken in this matter on May 21, 2014.

28. Attached to this Declaration as Exhibit AA hereto is a true and accurate copy of portions of the transcript of Raul Melendez deposition taken in this matter on May 19, 2014.

29. Attached to this Declaration as Exhibit AB hereto is a true and accurate copy of portions of the transcript of Edwin Murillo's deposition taken in this matter on March 15, 2012.

30. Attached to this Declaration as Exhibit AC hereto is a true and accurate copy of portions of the transcript of Barbara Sadauskas' deposition taken in this matter on February 4, 2014.

31. Attached to this Declaration as Exhibit AD hereto is a true and accurate copy of portions of the transcript of Manmeet Sandhu's deposition taken in this matter on May 22, 2014.

32. Attached to this Declaration as Exhibit AE hereto is a true and accurate copy of portions of the transcript of Michael Schmiersal's deposition taken in this matter on March 20, 2014.

33. Attached to this Declaration as Exhibit AF hereto is a true and accurate copy of portions of the transcript of Annette Singson's deposition taken in this matter on February 4, 2014.

34. Attached to this Declaration as Exhibit AG hereto is a true and accurate copy of portions of the transcript of Andrew Steinfeld's deposition taken in this matter on February 12, 2014.

35. Attached to this Declaration as Exhibit AH hereto is a true and accurate copy of portions of the transcript of Wayne Taylor's deposition taken in this matter on May 13, 2014.

36. Attached to this Declaration as Exhibit AI hereto is a true and accurate copy of portions of the transcript of Nathan Tucker's deposition taken in this matter on February 20, 2014.

37. Attached to this Declaration as Exhibit AJ hereto is a true and accurate copy of portions of the transcript of Cindy Young's deposition taken in this matter on April 11, 2014.

38. Attached to this Declaration as Exhibit AK hereto is a true and accurate copy of portions of the transcript of Donna Rosemarie Wilson's deposition taken in this matter on March 14, 2012.

39. Attached to this Declaration as Exhibit AL hereto is a true and accurate copy of a job description entitled Operations Manager, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000245-246.

40. Attached to this Declaration as Exhibit AM hereto is a true and accurate copy of a job description entitled Operations Assistant Store Manager, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000253-254.

41. Attached to this Declaration as Exhibit AN hereto is a true and accurate copy of a job description entitled Customer Service Logistics Manager, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF0001950-1951.

42. Attached to this Declaration as Exhibit AO hereto is a true and accurate copy of a job description entitled Merchandising Assistant Store Manager, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000250-251.

43. Attached to this Declaration as Exhibit AP hereto is a true and accurate copy of a job description entitled Merchandise Assistant Store Manager, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000249.

44. Attached to this Declaration as Exhibit AQ hereto is a true and accurate copy of various documents entitled E-learning Modules, documents produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF001182-1780.

45. Attached to this Declaration as Exhibit AR hereto is a true and accurate copy of a document entitled Burlington Coat Factory Salary Guidelines, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000105-110.

46. Attached to this Declaration as Exhibit AS hereto is a true and accurate copy of a document entitled Burlington Coat Factory Employee Handbook, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000001-51.

47. Attached to this Declaration as Exhibit AT hereto is a true and accurate copy of a document entitled Burlington Coat Factory Heart of Success Core Values, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000139-148.

48. Attached to this Declaration as Exhibit AU hereto is a true and accurate copy of a document entitled Burlington Coat Factory Code of Business Ethics, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000205-242.

49. Attached to this Declaration as Exhibit AV hereto is a true and accurate copy of various documents entitled Burlington Coat Factory Standard Operating Procedures, documents produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000889-1066.

50. Attached to this Declaration as Exhibit AW hereto is a true and accurate copy of a document entitled Burlington Coat Factory Store Guidelines, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF002125-2466.

51. Attached to this Declaration as Exhibit AX hereto is a true and accurate copy of a document entitled Burlington Coat Factory Merchandising Guidelines, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment

Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF003406-3492.

52. Attached to this Declaration as Exhibit AY hereto is a true and accurate copy of a document entitled Burlington Coat Factory Loss Prevention Guide, a document produced by Defendants Burlington Coat Factory Warehouse Corp., Burlington Coat Factory Investment Holdings, Inc., and Burlington Coat Factory Holdings, Inc., identified with Bates No. BCF000819-836.

/s/ Seth R. Lesser

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Seth R. Lesser